

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

THELMA P. WILLIS,

*

Plaintiff

*

v.

*

Case No.: AMD-02-CV3802

KERI L. DOUGHERTY, et al.

*

Defendants

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* * * * *

JOINT MOTION FOR MODIFICATION OF SCHEDULING ORDER

Keri L. Dougherty and Thelma P. Willis, by their attorneys, pursuant to Federal Rules of Civil Procedure 16, requests modification of the Court's Scheduling Order.

Under the current Scheduling Order, September 8, 2003 is the deadline for discovery. Trial is set to begin on or about February 17, 2004. Parties have concluded the fact depositions in this matter. The parties request this court extend the discovery deadline for the depositions of Plaintiff and Defendant's experts until November 30, 2003. Now that fact discovery depositions have concluded, it is the hope of the parties that settlement discussions may resolve this matter. If the parties are unable to resolve this matter in a timely manner, they wish to be able to conduct the depositions of Plaintiff and Defendant's experts. The parties believe this would be in the interest of judicial economy and all parties in this matter.

WHEREFORE, the Plaintiff and Defendant requests that this Court modify the Scheduling Order based on good cause shown. The parties ask that the discovery deadline for expert depositions be changed to November 30, 2003.

Respectfully submitted,

/s/ Samuel A. Paavola

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